

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-2(c)

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By: Stacey L. Mullen, Esquire (SM5598)

In Re: Case No.: ___18-24930
John J. Neely, Jr., Judge: ___KCF
Chapter: 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION
X TO CREDITOR'S MOTION OR CERTIFICATION OF DEFAULT
TO TRUSTEE'S MOTION OR CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following (choose one):

1. X Motion for Relief from the Automatic Stay filed by creditor
Christiana Trust. A hearing has been scheduled for
4/24/19 at 9:00 am

OR

 Motion to Dismiss filed by the Standing Chapter 13 Trustee.
A hearing has been scheduled for ___, at _____ am.

 Certification of Default filed by creditor,
I am requesting a hearing be scheduled on this matter.

OR

 Certification of Default filed by Standing Chapter 13 Trustee
I am requesting a hearing be scheduled on this matter.

I am objecting to the above for the following reasons (choose one):

- Payments have been made in the amount of \$ _____, but have
not been accounted for. Documentation in support is attached hereto.
 Payments have not been made for the following reasons and debtor proposes

repayment as follows (**explain your answer**):

X Other (**explain your answer**): Debtor can make his April payment plus begin making stipulation payments in April to cure his arrears. He is asking 6 months to cure his arrears.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify the above facts to be true. I am aware that if the above facts are willfully false, I am subject to punishment.

Date: 4/3/19

/s/ John J. Neely, Jr.
Debtor's Signature

NOTE: Pursuant to the Court's General Orders entered on January 4th, 2005, this form must be filed with the Court and served upon the creditor and the Standing Chapter 13 Trustee, **at least seven (7) days before the return date, pursuant to DNJ LBR 9013-1(d), Motion Practice**, if filed in opposition to a *Motion for Relief from the Automatic Stay; and within 10 days of the filing of a Creditor's Certification of Default under an Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*. Absent the filing of this mandatory new form, the creditor's stay relief motion will be deemed uncontested, and the creditor's appearance at the hearing will *not* be required.

1/3/05/jml